

EXHIBIT A

Clerk of the Superior Court
*** Electronically Filed ***
S. Allen, Deputy
7/26/2022 4:59:19 PM
Filing ID 14612850

Person/Attorney Filing: Derick Runion
Mailing Address: 1221 E Osborn Rd #201,
City, State, Zip Code: Phoenix, AZ 85014
Phone Number: (602)595-5559
E-Mail Address: drunion@curielandrunion.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 028390, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA

Lisa Collars

Plaintiff(s),

v.

Target Corporation, Inc., et al.

Defendant(s).

Case No. CV2022-009575

SUMMONS

To: Target Corporation, Inc.

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers were served on you with this Summons.
2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 201 W. Jefferson, Phoenix, Arizona 85003 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>.
Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
Note: If you do not file electronically you will not have electronic access to the documents in this case.
3. If this Summons and the other court papers were served on you within the State of Arizona, your Answer must be filed within TWENTY (20) CALENDAR DAYS from the date of service, not counting the day of service. If this Summons and the other court papers were served on you outside the State of Arizona, your Answer must be filed within THIRTY (30) CALENDAR DAYS from the date of service, not counting the day of service.

Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least 3 working days in advance of a scheduled court proceeding.

GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of MARICOPA

SIGNED AND SEALED this Date: *July 26, 2022*

JEFF FINE
Clerk of Superior Court

By: *SENA ALLEN*
Deputy Clerk



Requests for an interpreter for persons with limited English proficiency must be made to the division assigned to the case by the party needing the interpreter and/or translator or his/her counsel at least ten (10) judicial days in advance of a scheduled court proceeding.

If you would like legal advice from a lawyer, contact Lawyer Referral Service at 602-257-4434 or <https://maricopabar.org>. Sponsored by the Maricopa County Bar Association.

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Attorneys for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

LISA COLLARS, individually,

Plaintiff,

vs.

TARGET CORPORATION, INC.; TARGET
STORES, INC.; JOHN and JANE DOES I-X;
ABC CORPORATION I-X; and ABC
PARTNERSHIP I-X,

Defendants.

No. CV2022-009575

Complaint

(Tort – Non-Motor Vehicle)

For her Complaint, Plaintiff Lisa Collars alleges as follows:

1. Plaintiff Lisa Collars is a resident of Maricopa County, Arizona.
2. At all relevant times, defendant Target Corporation, Inc. and Target Stores, Inc. (collectively, "Target Corporation") were Minnesota corporations authorized to transact business in the State of Arizona.
3. Each of the defendants, separately and collectively, have caused events to occur in Maricopa County, Arizona that give rise to the causes of action alleged herein and all of the acts complained of herein occurred in Maricopa County, Arizona.
4. Upon information and belief and at all times relevant, each of the defendants was the agent of each of the other defendants, and all acts by any of the

1 defendants were within the scope of their agency with all other defendants, and each was
2 acting on their behalf, as well as on behalf of all other defendants.

3 5. All of the acts complained of herein occurred in Maricopa County,
4 Arizona.

5 6. At all times relevant, fictitiously name defendants were either spouses,
6 servants, employees, employers, owners, parent companies or subsidiaries of the named
7 defendants.

8 7. The fictitiously named defendants are, in some manner, responsible for the
9 acts alleged herein.

10 8. When the true names of these defendants become known, plaintiff will
11 seek leave to amend this Complaint.

12 9. Venue is proper in this Court.

13 10. Jurisdiction is proper in this Court.

14 11. The amount in controversy exceeds the minimum jurisdictional amount for
15 this Court.

16 12. This case qualifies for Tier II status.

17 13. The amount in controversy exceeds the amount for compulsory arbitration.

18 14. The subject Target store is located at 1515 N Litchfield Rd, Goodyear, AZ
19 85395 ("subject Target").

20 15. Upon information and belief and at all times relevant, Target Corporation,
21 through their duly authorized agents, owners, and employees possessed, controlled,
22 managed, and operated the subject Target in the County of Maricopa, State of Arizona.

23 16. Target Corporation is responsible for the actions of their employees
24 pursuant to the doctrine of respondeat superior.

25 17. Target Corporation is responsible for the actions of their agents/contractors
26 under common law principles of agency.

27 18. Target Corporation's duty is nondelegable and they are responsible for the
28 negligence of their agents/contractors.

1 19. Upon information and belief and at all times relevant, Target Corporation
2 owned, managed, maintained and/or otherwise controlled the subject Target.

3 20. Upon information and belief and at all times relevant, the Target
4 Corporation supervised and otherwise caused to be performed the continuing operation
5 and maintenance of the subject Target.

6 21. On or about August 1, 2020, Plaintiff Lisa Collars was shopping inside the
7 subject Target.

8 22. Upon information and belief, Target Corporation offers floor rugs for sale
9 inside the subject Target.

10 23. Upon information and belief, the floor rugs were maintained in an unstable
11 manner and/or not supported which created a risk of them falling.

12 24. Upon information and belief, Target Corporation through their duly
13 authorized agents, owners, and employees created the condition of the unstable and/or
14 unsupported floor rugs at the subject Target.

15 25. Upon information and belief, Target Corporation through their duly
16 authorized agents, owners, and employees permitted the condition of the unstable and/or
17 unsupported floor rugs at the subject Target to exist for a length of time that, in the
18 exercise of reasonable care, Target Corporation should have known of it.

19 26. Upon information and belief, Target Corporation through their duly
20 authorized agents, owners, and employees failed to warn of the condition of the unstable
21 and/or unsupported floor rugs.

22 27. Upon information and belief, Target Corporation through their duly
23 authorized agents, owners, and employees failed to remedy of the condition of the
24 unstable and/or unsupported floor rugs.

25 28. Target Corporation owed an affirmative duty to exercise reasonable care in
26 keeping its premises safe.

1 29. As a direct and proximate result, of Target Corporation's failures to
2 exercise reasonable care, diligence, and prudence over the premises, plaintiff Lisa
3 Collars was struck by falling floor rug(s).

4 30. As a direct and proximate result of Target Corporation's failures to
5 exercise reasonable care, Plaintiff Lisa Collars suffered injuries which resulted in her
6 damages.

7 31. Plaintiff Lisa Collars' injuries have caused her physical, mental, and
8 emotional pain and suffering.

9 32. Plaintiff Lisa Collars' injuries have impaired her bodily functions.

10 33. Plaintiff Lisa Collars' injuries have impaired her ability to perform
11 everyday tasks.

12 34. As a direct and proximate result of Target Corporation's acts and/or
13 omissions, plaintiff Lisa Collars was forced to incur numerous and diverse expenses for
14 medical care and treatment.

15 35. Upon information and belief, and as a direct and proximate result of Target
16 Corporation's acts and/or omissions, plaintiff Lisa Collars is informed and believes her
17 expenses on medical care and treatment will continue in the future.

18 WHEREFORE, Plaintiff Lisa Collars requests a jury trial and judgment against
19 defendants, and all of them, as follows:

20 A. For general damages to compensate plaintiff Lisa Collars for the disability,
21 pain, anguish, sorrow, mental suffering, stress and shock that she has experienced, and
22 will continue to experience in the future, as a result of her injuries;

23 B. For the reasonable value of medical expenses incurred and to be incurred
24 in the future for the incident-related medical care of plaintiff Lisa Collars;

25 C. For loss of household services;

26 D. For other general and special damages available under law;

27 E. For pre-judgment interest on liquidated damages;

28 F. For Plaintiff's cost of suit; and,

1 G. For such other and further relief as this Court deems just and proper.
2 DATED July 26, 2022.
3

4 CURIEL & RUNION, PLC
5

6 By: /s/ Derick Runion
7 Derick Runion
8 Triumph Curiel
9 1221 East Osborn Road, Suite 201
10 Phoenix, Arizona 85014
11 *Attorneys for Plaintiff Lisa Collars*
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**CERTIFICATE OF
COMPULSORY ARBITRATION**

I certify that I am aware of the dollar limits and any other limitations set forth by the Local Rules of Practice for the Maricopa County Superior Court, and I further certify that this case IS NOT subject to compulsory arbitration, as provided by Rules 72 through 77 of the Arizona Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this

By: Derick Runion /s/
Plaintiff/Attorney for Plaintiff


Service of Process Transmittal Summary

TO: CATHY SCHUDA
 Target Corporation
 1000 NICOLLET MALL, MS: TPS-3155
 MINNEAPOLIS, MN 55403-2542

RE: Process Served in Arizona

FOR: Target Corporation (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: LISA COLLARS, individually // To: Target Corporation

CASE #: CV2022009575

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

PROCESS SERVED ON: C T Corporation System, Phoenix, AZ

DATE/METHOD OF SERVICE: By Process Server on 09/20/2022 at 09:57

JURISDICTION SERVED: Arizona

ACTION ITEMS: CT has retained the current log, Retain Date: 09/20/2022, Expected Purge Date: 09/25/2022

Image SOP

Email Notification, Non Employee Litigation Target gl.legal@target.com

REGISTERED AGENT CONTACT: C T Corporation System
 3800 N. Central Avenue
 Suite 460
 Phoenix, AZ 85012
 877-564-7529
 MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.